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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROBERT ALBERS,

Plaintiff,

v.

NATIONSTAR MORTGAGE, LLC, a
Delaware Limited Liability Company;
and QUALITY LOAN SERVICE
CORPORATION OF WASHINGTON, a
Domestic Corporation,

Defendants.

Case No. 4:16-CV-05147-SAB

RESPONSE TO ORDER TO
SHOW CAUSE

Pursuant to this Court's Order to Show Cause entered on August 28, 2017, Plaintiff submits the following:

Plaintiff's counsel has been out of state for emergency hearings in two cases. First, plaintiff's counsel was required to obtain a restraining order to prevent the wrongful foreclosure

1-RESPONSE TO ORDER TO SHOW CAUSE

of his clients' home in the case Thomas v. Ocwen Loan Servicing, LLC et al in the Western District of Washington. Secondly, in the case In re: Evans, a dispute arose between his client and another mortgage servicer. Plaintiff's counsel was required to attend to matters that had to be heard and had an order entered by August 30, 2017 due to the fact that the judge in the matter, Hon. Frank R. Alley, was retiring from service and could not make any further orders after his retirement. Judge Alley had dealt with the years-long bankruptcy case and one of his prior orders was in dispute. Judge Alley read briefing and heard arguments and no extension could be sought to provide an order to resolve the dispute.

Lastly, hearings were set on shortened notice requiring plaintiff's counsel to attend hearings in other bankruptcy cases.

Due to the time and travel involved in these cases, Plaintiff's counsel has not been able to prepare and file the Joint Status Certificate until now. Plaintiff's counsel has conferred with Defense counsel regarding the Joint Certificate and the Certificate will be filed today.

Plaintiff's counsel understands the need to meet the Court's deadlines and will work with due diligence to ensure that all future deadlines are met.

DATED: September 9, 2017

/s/ Keith D. Karnes
Keith D. Karnes, WSBA #35000
Attorney for Plaintiff

2-RESPONSE TO ORDER TO SHOW CAUSE

CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I filed the foregoing document via ECF which will in turn serve:

David J. Elkanich
Holland & Knight, LLP
2300 US Bancorp Tower
111 SW Fifth Avenue Ste 2300
Portland, OR 97204
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Robert McDonald
Quality Loan Service Corp. of Washington
108 1st Ave. Ste 202
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This document was also served via email to the above parties.

DATED September 8, 2017.

/s/ Keith D. Karnes
Keith D. Karnes, WSAB #35000
Attorney for Plaintiff

3-RESPONSE TO ORDER TO SHOW CAUSE